

Charles A. Gruen (CG5456)
LAW OFFICES OF CHARLES A. GRUEN
381 Broadway, Suite 300
Westwood, New Jersey 07675
(201) 342-1212

Aaron Z. Tobin (*pro hac vice application to be filed*)
Jared T.S. Pace (*pro hac vice*)
CONDON TOBIN SLADEK THORNTON NERENBERG PLLC
8080 Park Lane, Suite 700
Dallas, Texas 75231
Tel.: 214-265.3800; Fax: 214-691-6311
atobin@condontobin.com
jpace@condontobin.com

*Counsel for Respondents Condon Tobin Sladek
Thornton Nerenberg PLLC, Law Offices of
Charles A. Gruen, Greg E. Lindberg, Global
Growth Holdings, Inc.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	
	:	Chapter 15
PB LIFE AND ANNUITY CO. LTD, et al,	:	
	:	Case No. 20-12791 (SCC)
Debtor in Foreign Proceeding.	:	
.....	:	(Jointly Administered)

**RESPONDENTS' MOTION TO EXTEND JULY 14, 2021 DEADLINES IN THE
COURT'S ORDER AT ECF 79**

Pursuant to Local Rule 9006-2, Respondents Condon Tobin Sladek Thornton Nerenberg PLLC, Law Offices of Charles A. Gruen, Greg E. Lindberg, and Global Growth Holdings, Inc. (collectively, "Respondents") file this Motion to Extend July 14, 2021 Deadline in the Court's

Order at ECF 79, and in support show:

At a hearing on June 24, 2021 on Petitioner's motion to compel turnover of records (ECF 47), the Court ruled that certain materials and privilege logs be produced by July 14, 2021. The parties submitted competing proposed orders and the Court filed an order on July 8, 2021. Respondents file this motion respectfully requesting to extend the July 14th deadline set forth in decretal paragraphs 2 and 4 of the Court's order to July 23, 2021. The additional time should allow the Respondents the ability to finish assessing and preparing the materials, which are voluminous, and the privilege logs described in those paragraphs.

Before filing this motion, the undersigned conferred with opposing counsel at Stevens & Lee by email. Stevens & Lee stated that Petitioners do not consent to this motion.

WHEREFORE, Respondents respectfully request that the Court extend the July 14, 2021 deadline in decretal paragraphs 2 and 4 of its order at ECF 79 to July 23, 2021. Respondents respectfully request all other relief to which they are entitled.

Respectfully Submitted,

CONDON TOBIN SLADEK THORNTON NERENBERG PLLC

/s/ Jared T.S. Pace

Aaron Z. Tobin (*pro hac vice application to be filed*)

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jpace@condontobin.com

8080 Park Lane, Suite 700

Dallas, Texas 75231

Telephone: 214-265-3800

Facsimile: 214-691-6311

and

Charles A. Gruen (CG5456)

cgruen@gruenlaw.com

LAW OFFICES OF CHARLES A. GRUEN

381 Broadway, Suite 300

Westwood, New Jersey 07675

Telephone: 201-342-1212

Counsel for Respondents